

## REMARKS

Applicants respectfully request that the above-identified application be reexamined.

The Office Action mailed on May 25, 2005 ("Office Action") rejected all of the claims remaining in this application. More specifically, Claims 31, 69, and 103 were objected to because of informalities. Claims 29-31, 67-69, 101-103, and 105-119 were rejected under 35 U.S.C. § 103(a) as being unpatentable in view of the teachings of Lakritz, U.S. Patent No. 6,623,529 (hereinafter "Lakritz").

Applicants thank the Examiner for the telephone interview that occurred on September 9, 2005. According to suggestions made by the Examiner and agreements made with the Examiner during the telephone interview, the response makes clarifying amendments to the language of Claims 29, 67, and 101. The response also makes clarifying amendments to the language of Claims 31, 69, and 103 to overcome the informality objection. Applicants submit that the amendments made in accordance with the Examiner's suggestions put the application in an allowable form. The following discussions elaborate why the claims, as amended, further distinguishes applicant's invention from the cited reference Lakritz and that the rejection of Claims 29-31, 67-69, 101-103, and 105-119 under 35 U.S.C. § 103 in view of the teachings of Lakritz should be withdrawn and this application allowed.

Prior to discussing the reasons why applicants believe the claims pending in this application are allowable, a brief discussion of the present invention and the cited and applied reference is presented. The following discussions of the present invention and the teachings of the applied reference are not provided to define the scope or interpretation of any of the claims of this invention. Instead, they are provided to help the United States Patent and Trademark Office better appreciate important claim distinctions discussed hereafter.

LAW OFFICES OF  
CHRISTENSEN O'CONNOR JOHNSON KINDNESS<sup>PLLC</sup>  
1420 Fifth Avenue  
Suite 2800  
Seattle, Washington 98101  
206.682.8100

## Summary of the Invention

The present invention addresses the growing need of information providers to provide content that is both interesting and understandable to diverse users from different parts of the world. The process of providing content that is both interesting and understandable to users from diverse locations is known as localization. For example, a Web page written in English that originated in the United States needs to go through a localization process before it is delivered to a user understanding only French, or to a user understanding English but living in South Africa.

The essence of the invention is to provide a method, a computer-readable medium having computer-executable instructions, and a computer system for localizing content for viewers with diverse language backgrounds and/or geographical locations. In particular, the method, the computer-readable medium having computer-executable instructions, and the computer system extracts the localizable portion from a document. The localizable portion is localizable (translatable) according to different languages and/or geographical locations so as to form multiple localized versions. The localized versions can be created by third-party developers, if desired. Regardless of how the localized versions are created, the method, computer-readable medium having computer-executable instructions, and the computer system store the localized versions, translate each localized version of the localizable content into a plurality of encoded versions, and store the encoded versions in a directory hierarchy.

In one exemplary embodiment of the invention, the localizable content of a localizable document is isolated from the underlying code by extracting string literals from the code and storing them as symbols. The localizable content is the content that can be localized for a particular user based on the language and/or the geographical location of the user. The localizable content may then be exported to a localizer for translation to localized content in one or more alternate languages. The localized content is stored in a directory hierarchy. The localized content is automatically converted to one or more encoded versions, which are

character set supports such as DBCS, Unicode, and UTF-8. These encoded versions are stored in the directory hierarchy as well.

The present invention allows users with different language backgrounds and/or geographical locations to receive content that they are able to understand and find interesting. Further, the present invention uses server resources efficiently. The data storage infrastructure of the present invention allows a server to support multiple languages and to readily support the addition of new languages. Furthermore, the isolation of localizable content from the underlying code preserves the operability of the underlying code when the localizable content is in the localization process. In addition, the support of different encoded versions allows the localized content to be used on different types of Internet browsers.

#### Summary of Lakritz

Lakritz purportedly teaches a document localization, management, and delivery system. Lakritz automatically determines the language and the country of a Web site and directs the Web server to deliver the appropriate localized content contained in one or more country/language databases to the visitor's browser. The visitor's browser is notified of the proper font needed to display the selected language and is allowed to download the font.

Lakritz further provides a toolkit that allows a master site to be built that is language and country independent. The actual language content is stored in one or more language/country databases. When a visitor enters the master site, the requested document is automatically served in the visitor's language and for the visitor's country by filling in a document template from the master site requesting the correct language content from the language/country database.

In summary, Lakritz does not teach the subject matter recited in applicants' invention. For example, nowhere does Lakritz teach extracting a localizable portion of the localizable Internet document. What Lakritz teaches is to extract localizable documents from a computer

database. Nor does Lakritz teach converting each localized version of the localizable portion into a plurality of encoded versions. What Lakritz teaches is to encode text for subsequent translation.

Re: Claim Objections

The Office Action objected to Claims 31, 69, and 103 because of the abbreviations DBCS, Unicode, and UTF-8. Because these abbreviations are standard industry terms that have been popularly used in the technical field, applicants do not entirely agree with this objection. However, to further progress of the prosecution of this patent application, applicants comply with the request in the Office Action to correct these abbreviations. Applicants have amended the claims to indicate what these abbreviations stand for. Applicants submit that the amendments address the Office Action's request, and the objections to these claims should be withdrawn.

Re: Claims Rejections - 35 U.S.C. § 103

The Office Action rejected Claims 29-31, 67-69, 101-103, and 105-119 as being anticipated by Lakritz. The Office Action asserts that Lakritz discloses each and every element of applicants' claims. Applicants respectfully disagree. As described in more detail below, Lakritz fails to disclose or suggest elements of the independent claims.

A. Independent Claims 29, 67, and 101

The independent Claims 29, 67, and 101 recite a method, a computer-readable medium, and a system for generating localized versions of Internet documents according to different languages and/or geographical locations in a manner not taught or suggested by Lakritz. More specifically, Claim 29 is a method claim, Claim 67 is a computer-readable medium claim, and

LAW OFFICES OF  
CHRISTENSEN O'CONNOR JOHNSON KINDNESS<sup>PLLC</sup>  
1420 Fifth Avenue  
Suite 2800  
Seattle, Washington 98101  
206.682.8100

Claim 101 is a computer system claim. All the three claims, in their amended form, specifically recite:

extracting a localizable portion from the localizable Internet document, wherein said localizable portion being translatable according to different languages and/or geographical locations so as to form multiple localized versions and the non-localizable content is not translatable;

storing localized versions of the localizable portion in a directory hierarchy;

converting each localized version to a plurality of encoded versions; and

storing the encoded versions in the directory hierarchy.

Lakritz does not teach the subject matter recited in Claims 29, 67, and 101. For example, nowhere does Lakritz teach **"extracting a localizable portion of a localizable Internet document."** In the portions of Lakritz (Col. 10, lines 40-42; Col. 11, lines 52-60; Col. 9, lines 44-57) cited by the Office Action, applicants have been unable to locate any pertinent subject matter. In these portions of text, as correctly indicated by the Office Action (see Office Action, page 3), Lakritz teaches that documents needing to be translated are extracted from the language and country database (Col. 10, lines 40-42; Col. 11, lines 52-60). The Office Action cites these portions of text in Lakritz to suggest that Lakritz teaches extracting a localizable portion of a localizable Internet document in that Lakritz teaches documents needing to be translated are extracted from the language and country database. (Office Action, pages 3 and 7.) Applicants respectfully disagree. Documents in a language and country database are not the same as a localizable portion of a localizable Internet document. **A database is not the same as an Internet document.** As known by those of ordinary skill in the art, a database generally refers to data organized and stored on a computer that can be searched and retrieved by a computer program. On the contrary, an Internet document is a document on the World Wide

LAW OFFICES OF  
CHRISTENSEN O'CONNOR JOHNSON KINDNESS<sup>PLC</sup>  
1420 Fifth Avenue  
Suite 2800  
Seattle, Washington 98101  
206.682.8100

Web, usually coded with a markup language such as HTML or XML. The markup language adds computer-executable instructions to text to form an Internet document.

In addition, Lakritz does not teach "converting each **localized version** to a plurality of encoded versions." The portions of the Lakritz text (Col. 4, lines 29-34; Col. 12, lines 29-32; Col. 36, lines 31-35; and Col. 28, lines 15-16) cited in the Office Action appear to teach identifying the encoding of a text so to properly interpret the text for subsequent translation. In other words, Lakritz appears to teach including sufficient information to identify the encoding of **a text that will be translated subsequently**. Nowhere does Lakritz teach converting localized content into a plurality of encoded versions, as recited in Claims 29, 67, and 101.

The Office Action correctly concludes that Lakritz does not specifically teach "storing the multiple localized versions of the localizable portion and the encoded versions in a directory hierarchy." However, the Office Action suggests that it would have been obvious to one of ordinary skill in the art, at the time of applicants' invention, to apply Lakritz's teaching to include storing documents in a directory hierarchy. Applicants categorically disagree with such a suggestion. On the other hand, even if it would have been obvious to apply Lakritz's teaching to include the "directory hierarchy" limitation, Lakritz still would not anticipate the other subject matter of Claims 29, 67, and 101 discussed above.

In summary, there is simply no teaching or suggestion in Lakritz of the subject matter recited in Claims 29, 67, or 101. Thus, applicants submit that Claims 29, 67, and 101 are clearly allowable.

#### B. Dependent Claims

Since all of the other claims remaining in this application depend from Claims 29, 67, and 101, respectively, these claims are submitted to be allowable for at least the same reasons that Claims 29, 67, and 101 are submitted to be allowable.

LAW OFFICES OF  
CHRISTENSEN O'CONNOR JOHNSON KINDNESS<sup>PLLC</sup>  
1420 Fifth Avenue  
Suite 2800  
Seattle, Washington 98101  
206.682.8100

CONCLUSION

The response amended the claims accordingly to suggestions made by the Examiner during the telephone interview occurred on September 9, 2005. In view of the amendments and the foregoing comments, applicants respectfully submit that all of the pending claims in this application are clearly allowable in view of the cited and applied reference. As a result, applicants respectfully request that all of the claims remaining in this application be allowed and this application passed to issue.

If the Examiner has any questions, she is invited to contact applicants' attorney at the number set forth below.

Respectfully submitted,

CHRISTENSEN O'CONNOR  
JOHNSON KINDNESS<sup>PLLC</sup>



Joy Y. Xiang  
Registration No. 55,747  
Direct Dial No. 206.695.1607

I hereby certify that this correspondence is being deposited with the U.S. Postal Service in a sealed envelope as first class mail with postage thereon fully prepaid and addressed to Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on the below date.

Date:

Sept. 14, 2005



JYX:ejh/dmg

LAW OFFICES OF  
CHRISTENSEN O'CONNOR JOHNSON KINDNESS<sup>PLLC</sup>  
1420 Fifth Avenue  
Suite 2800  
Seattle, Washington 98101  
206.682.8100